

REMARKS

Claims 1-3 and 6 remain in the application and claim 1 has been amended hereby.

Claim 1 has been amended in part to correct the misspelling pointed to in the Office Action at paragraph 2.

Reconsideration is respectfully requested of the rejection of claims 1-3 under 35 USC 103(a), as being unpatentable over Karube et al. '050.

The present invention is directed to a semiconductor storage medium device configured to be used as a general purpose memory for storing various types of data having different formats (e.g. still image data, moving image data, music data, etc.)

Features of the semiconductor storage medium device according to the present invention are a controller for controlling access to a first memory based on control information stored in a second memory, wherein the controller operates based on the control information stored in the second memory to store image data and data having a format different from a format of the image data, in the form of a directory structure, in the first memory.

Further, the controller for controlling access to the first memory holds the data in the first memory until the data is deleted in response to a user instruction, that is, until the user manually deletes the data.

These features of the present invention are recited in currently amended independent claim 1.

It is respectfully submitted that Karube et al. '050 fails to show or suggest controlling the storage of data having different formats in a first memory based on control information stored in a second memory in the form of a directory structure. Karube et al. '050 is silent about storing data having different formats. Karube et al. '050 is merely teaching the storing of only image data and instructions for controlling only the image data. See FIFO (207 in Fig. 14A) and col. 14, lines 55-57 of Karube et al. '050.

Further, the semiconductor storage medium device according to the presently claimed invention is directed to a general purpose memory for holding data having different formats until the data is manually deleted by a user. Karube et al. '050 uses a FIFO wherein old data is eventually deleted without user intervention.

Furthermore, regarding the assertions set forth in the Advisory Action at paragraph 5 stating that all the recited limitations after "wherein said controller operates" are merely functional language having no patentable weight, it is respectfully submitted that the C.C.P.A. has pointed out that there is nothing intrinsically wrong in defining something by what it does rather than what it is, and that functional language in the claims must be given full weight and may not be disregarded in evaluating the

patentability of the subject matter defined employing such functional language. See In re Hallman, 210 U.S.P.Q. 609, 611 (C.C.P.A. 1981).

It is respectfully submitted that for at least the above-noted reasons, the controller of Karube et al. '050 does not inherently function in the manner required by the presently claimed invention.

Accordingly, it is respectfully submitted that amended independent claim 1, and the claims depending therefrom, are patentably distinct over Karube et al. '050.

Reconsideration is respectfully requested of the rejection of claim 6 under 35 USC 103(a), as being unpatentable over Karube et al. '050 in view of Sanemitsu.

Claim 6 depends from claim 1, which rejection over Karube '050 has been addressed above and, because there are no features in Sanemitsu that somehow could be combined with Karube '050 and result in the presently claimed invention, it is respectfully submitted that claim 6 is patentably distinct over Karube '050 in view of Sanemitsu.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,

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